

DOUGLASSVILLE DISPOSAL OU2
ADMINISTRATIVE RECORD FILE * ** *** ****
INDEX OF DOCUMENTS

I. SITE IDENTIFICATION

1. U.S. EPA Potential Hazardous Waste Site Identification, Berks Associates, Inc., 10/31/80. P. 100001-100001.

* Administrative Record File available 3/21/88, updated 4/5/88, 7/1/94, 5/8/97, 3/19/99, 4/13/99, 5/6/99, and 10/29/99.

** For further documentation on this site, please refer to the Douglassville Disposal Site OU3 Administrative Record.

*** Supporting Sampling Data is stored at the Region III Central Regional Laboratory in Annapolis, Maryland.

**** On September 27, 1985, the first of three Records of Decision ["the RODs"] was signed by EPA Region III for remedial activities at the Site. The September 1985 ROD called for the removal and consolidation of contaminated soils and sediments from the waste water treatment drainage ditch, drainage swale, buried lagoon and drum disposal area and the installation of an impermeable cap on the former sludge area and sludge disposal area. This ROD was superseded by EPA, and two other RODs were signed on June 24, 1988, and June 30, 1989, which together address the same basic actions plus requirements that soil beneath the Site tanks be remediated. EPA designated the June 24, 1988, ROD as the ROD for Operable Unit No. 1 and the June 30, 1989, ROD as the ROD for Operable Unit No. 2. EPA implemented the June 24, 1988, ROD (OU1) using monies from the Superfund Trust account and conducted the Tank Farm Remedial Action. The June 30, 1989, ROD (OU2) was divided into Phase I and Phase II. The ROD (OU2) for Phase I, which required the construction of a cap, was implemented by the PRPs under a Unilateral Administrative Order (UAO) issued in July 1991. The PRPs were issued a UAO in June 1993 to implement the June 30, 1989, ROD (OU2) for Phase II.

2. U.S. EPA Notification of Hazardous Waste Site, Berks Associates, Inc., 6/81. P. 100002-100002.
3. U.S. EPA Potential Hazardous Waste Site, Identification and Preliminary Assessment, Berks Associates, Inc., 9/9/81. P. 100003-100006.
4. U.S. EPA Potential Hazardous Waste Site, Final Strategy Determination, Berks Associates, Inc., 9/9/81. P. 100007-100007.
5. U.S. EPA Potential Hazardous Waste Site, Identification and Preliminary Assessment, Berks Associates, Inc., 3/5/82. P. 100008-100014. A Field Trip Summary Report is attached.
6. U.S. EPA Potential Hazardous Waste Site, Site Identification Report, Berks Associates, Inc., 5/6/82. P. 100015-100024.
7. Report: A Site Inspection of Berks Associates, prepared by Ecology and Environment, Inc., 8/3/82. P. 100025-100120.
8. Letter to Mr. Michael Steiner, Pennsylvania Department of Environmental Resources (PADER), from Ms. Kathryn Hodgkiss, U.S. EPA, re: The Site Inspection Report, 8/15/83. P. 100121-100121.
9. Letter to Mr. Bruce Beitler, PADER, from Ms. Kathryn Hodgkiss, U.S. EPA, re: The Site Inspection Report, 8/15/83. P. 100122-100122.
10. Report: Field Trip Summary Report, prepared by Mr. Joseph W. Layser, (undated). P. 100123-100125.

II. REMEDIAL ENFORCEMENT PLANNING

1. Letter to Mr. R.L. Noland, Ametek, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200001-200003.
2. Letter to Mr. Walter Williams, Bethlehem Steel Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200004-200006.
3. Letter to Mr. Al Cimino from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200007-200009.
4. Letter to Mr. William Cox, City Waste Oil Service, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200010-200012.
5. Letter to Mr. Clement A. Revelti, Dana Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200013-200015.
6. Letter to Mr. W.R. Grigsby from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200016-200018.
7. Letter to Ms. Lorraine Szyman, J&L Industries, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200019-200021.
8. Letter to Mr. A.S. Hutchcraft, Jr., Kaiser Aluminum & Chemical Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200022-200024.
9. Letter to Mr. John Lavala from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200025-200027.
10. Letter to Mr. Joseph Lorenz from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200028-200030.
11. Letter to Mr. W.W. Wilson, Lukens Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of

- potential liability, 9/19/85. P. 200031-200033.
12. Letter to Mr. John B. Curcio, Mack Trucks, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200034-200036.
 13. Letter to Mr. E.M. Note from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200037-200039.
 14. Letter to Mr. William Schiavani from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200040-200042.
 15. Letter to Mr. Kevin Dunnigan, Thomas & Betts Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200043-200045.
 16. Letter to Mr. Leonard Tohanczyn from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200046-200048.
 17. Letter to Mr. Thomas Lewis, Total Recovery, Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200049-200051.
 18. Letter to Mr. Lee Walter from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200052-200054.
 19. Letter to Mr. James W. Yerger from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 9/19/85. P. 200055-200057.
 20. Letter to Mr. James H. McNeal, The Budd Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 10/11/85. P. 200058-200060.
 21. Letter to Mr. Daniel DaVall, Midland Ross Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 10/11/85. P. 200061-200063.
 22. Letter to Mr. Thomas H. Cifelli, Wagner Electric Corporation, from Mr. Stephen R. Wassersug, U.S.

EPA, re: Notice of potential liability, 10/11/85.
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23. Letter to Mr. Paul R. Wikinson, E.I. DuPont de Nemours, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 11/13/85. P. 200067-200069.
24. Letter to Mr. John R. Welch, Jr., General Electric Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 11/13/85. P. 200070- 200072.
25. Letter to Mr. Frank Umbriac, Hazleton Oil Salvage, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 11/13/85. P. 200073-200075.
26. Letter to Mr. Stanley Pace, TRW Inc., from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 11/13/85. P. 200076-200078.
27. Letter to Mr. Joseph Mooney, Monsey Products Company, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, 11/13/85. P. 200079-200081.
28. Letter to Mr. Bernard Jaffe, Sun Chemical Corporation, from Mr. Stephen R. Wassersug, U.S. EPA, re: Notice of potential liability, (undated). P. 200082-200084.
29. Letter to Mr. Donald Becker, PADER, from Mr. Victor Janosik, U.S. EPA, re: Notification that EPA intends to issue a unilateral administrative order to certain PRPs for remediation of the Douglassville Disposal Site, 3/19/93. P. 200085-200085.

30. Administrative Order by Consent In The Matter Of: Douglassville Disposal Site, Operable Unit No.2, Phase II, Union Township, Pennsylvania, Docket No. III-93-43-DC, Berks Associates, Inc.; H. Lester Schurr; Monsey Products, Inc.; Primerica Corporation; Caterpillar, Inc.; CRC Chemicals, Inc.; General Electric Company; Leeds & Northrup Company; Cooper Industries, Inc.; Handy & Harmon Tube Company, Inc.; Pennsylvania Power and Light Company, Inc.; Ametek, Inc.; Worthington Enterprises, Inc.; JGB Industries, Inc.; General Dynamics Corporation; New Jersey Transit Rail Operations, Inc.; Consolidated Rail Corporation; A & A Waste Oil Company; National Rail Passenger Corporation (AMTRAK); Chrysler Corporation; Mack Trucks, Inc.; Mayer Pollock Steel Corporation; Textile Chemical Company; Werner's Bus Lines; Cerro Metal Products Company; Thomas & Betts Corporation; Windsor Service, Inc.; Dana Corporation; Total Recovery, Inc.; Simon Resources, Inc.; Mid-State Trading Company, Inc.; Albert Cimino; James Gibbons; and James Yerger, Respondents, 6/30/93. P. 200086-200164.
31. Establishment of Administrative Record In The Matter Of: Douglassville Disposal Site, Operable Unit No. 2, Phase II, Union Township, Pennsylvania, Docket No. III-93-43-DC, 6/30/93. P. 200165-200180. A Douglassville Disposal Site OU2 - Phase II administrative record file index of documents for a unilateral administrative order is attached.
32. Letter to Mr. Sanford Weill, Primerica Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with the requirements of the Order, 6/30/93.

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33. Letter to Mr. Robert Campbell, Pennsylvania Power & Light Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200182-200182.
34. Letter to Mr. Kenneth Worton, New Jersey Transit Rail Operations, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200183-200183.
35. Letter to Mr. Joseph Mooney, Monsey Products, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200184-200184.
36. Letter to Mr. John Curcio, Mack Trucks, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200185-200185.
37. Letter to Mr. W.E. Williamson, Leeds & Northrup Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200186-200186.
38. Letter to Mr. J. Glenwood Baker, JGB Industries, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of

the Order, 6/30/93.
P. 200187-200187.

39. Letter to Mr. John Welch, General Electric Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200188-200188.
40. Letter to Mr. James Gibbons from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200189-200189.
41. Letter to Mr. Albert Cimino from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200190-200190.
42. Letter to Mr. R.L. Noland, Ametek, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
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43. Letter to Mr. Robert Cizik, Cooper Industries, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200192-200192.
44. Letter to Mr. Southwood Morcott, Dana Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200193-200193.
45. Letter to Mr. H. Lester Schurr, Berks Associates,

Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200194-200194.

46. Letter to Mr. Robert Eaton, Chrysler Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200195-200195.
47. Letter to Mr. James Mellor, General Dynamics Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200196-200196.
48. Letter to Mr. Richard Rivers, CRC Chemicals, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
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49. Letter to Mr. Julius Simon, Mid-State Trading Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200198-200198.
50. Letter to Mr. H. Lester Schurr from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200199-200199.
51. Letter to Mr. Steven Clark, Textile Chemical Company, from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the

respondent's intent to comply with requirements of the Order, 6/30/93.
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52. Letter to Mr. Fred Ochroche, Werner's Bus Lines, from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200201-200201.
53. Letter to Mr. James Yerger from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200202-200202.
54. Letter to Mr. David Gardiner, Cerro Metal Products Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200203-200203.
55. Letter to Mr. George Walborn, Windsor Service, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200204-200204.
56. Letter to Mr. Thomas Lewis, Total Recovery, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200205-200205.
57. Letter to Mr. Samuel Goldstein, A & A Waste Oil Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.

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58. Letter to Mr. Peter Donis, Caterpillar, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200207-200207.
59. Letter to Mr. Samuel Simon, Simon Resources, Inc., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200208-200208.
60. Letter to Mr. Graham Claytor, AMTRAK, from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200209-200209.
61. Letter to Mr. James Hagen, Consolidated Rail Corp. (Conrail), from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93. P. 200210-200210.
62. Letter to Mr. Donald Orr, Mayer Pollock Steel Corp., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200211-200211.
63. Letter to Mr. G. G. Goddard, Handy & Harmon Tube Co., from Mr. Abraham Ferdas, U.S. EPA, re: Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200212-200212.
64. Letter to Mr. T. Kevin Dunningan, Thomas & Betts Corp., from Mr. Abraham Ferdas, U.S. EPA, re:

Transmittal of the Administrative Order by Consent and request for notification regarding the respondent's intent to comply with requirements of the Order, 6/30/93.
P. 200213-200214.

65. Letter to Mr. Robert Orwan, PADER, from Mr. Abraham Ferdas, re: Transmittal of the Administrative Order by Consent, issued on June 30, 1993, 7/8/93. P. 200215-200215.
66. Letter to Mr. Lawrence Jensen, Holland and Hart, from Ms. Patricia Miller, U.S. EPA, re: Transmittal of the Administrative Order issued to Worthington Enterprises, Inc., and request for a current mailing address for the company, 8/11/93. P. 200216-200217. A June 30, 1993, letter to Mr. Mark Worthington, Worthington Enterprises, Inc., from Mr. Abraham Ferdas, U.S. EPA, transmitting a copy of the Order issued by EPA, is attached.
67. Handwritten letter to U.S. EPA, from Mr. Albert Cimino, re: Notification that Mr. Cimino will not be able to comply with the Order due to a lack of assets, 9/13/93. P. 200218-200218.
68. Letter to Douglassville UAO Respondents from Ms. Patricia Miller, U.S. EPA, re: Transmittal of a modification to the September 17, 1993, Douglassville UAO, Docket No. III-93-43-DC, 9/21/93. P. 200219-200221. Modification No. 1 is attached.
69. Letter to Douglassville UAO Respondents from Ms. Patricia Miller, U.S. EPA, re: Transmittal of a modification to the September 17, 1993, Douglassville UAO, Docket No. III-93-43-DC, 12/16/93. P. 200222-200224. Modification No. 2 is attached.
70. Letter to Ms. Patricia Miller, U.S. EPA, from Mr. Dennis Moore, Amtrak, re: Request for notification concerning a modification to the UAO, which would change the effective date to February 28, 1994, and the notification date to March 28, 1994, 2/25/94.
P. 200225-200225.

71. Letter to Douglassville UAO Respondents from Ms. Patricia Miller, U.S. EPA, re: Transmittal of a modification to the UAO, Docket No. III-93-43-DC, which extends the effective date and the compliance date, 2/28/94. P. 200226-200229. Modification No. 3 is attached.
72. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Michael Rettig, Thomas & Betts, re: Request for EPA to consider the possibility of a de minimis settlement and to reconsider the issuance of an administrative order against Thomas & Betts, 3/21/94. P. 200230-200245. The following are attached:
- a) an August 6, 1993, letter to Ms. Patricia Miller, U.S. EPA, from Mr. Michael Rettig, Thomas & Betts, requesting EPA to consider the possibility of a de minimis settlement with Thomas & Betts;
 - b) a May 15, 1990, report from the Douglassville Transactional Database;
 - c) a June 20, 1985, letter to Mr. Jack Kelly, U.S. EPA, from Ms. Jesse Woldman, Thomas & Betts, transmitting requested information regarding waste transported from the Doylestown facility by Reclamation Resources, Inc.;
 - d) "Summary of Hazardous Waste Activity, Thomas & Betts Corp./Doylestown Plant, May 1976 - May 1985."
73. Letter to Mr. Stanley Laskowski, U.S. EPA, from Mr. Mark Worthington, Worthington Enterprises, re: Notification that Worthington Enterprises does not have financial resources available to comply with the terms of the Administrative Order, 3/26/94. P. 200246-200247.
74. Letter to Mr. Victor Janosik, U.S. EPA, from Ms. Paula Ryan, Duane, Morris & Heckscher, re:

Notification that Mr. James Yerger is unable to comply with the terms of the UAO, 3/28/94. P. 200248-200254. The following are attached:

- a) "Declaration of James W. Yerger," dated December 3, 1993;
 - b) "Schedule A - Real Property;"
 - c) "Schedule B - Personal Property;"
 - d) a December 13, 1993, letter to Mr. Ralph Lindeman, U.S. Department of Justice (DOJ), from Mr. Timothy Cramer, Duane, Morris & Heckscher, requesting the dismissal of Civil Action No. 91-4868 against James W. Yerger.
75. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. John Fitzpatrick, Mylotte, David & Fitzpatrick, re: Notification that Total Recovery, Inc., will not comply with the terms of the UAO, 3/28/94. P. 200255-200276. An "Answer of Total Recovery, Inc., to Plaintiff's Complaint, with Affirmative Defenses, Cross-Claims and Counterclaims," is attached.
76. Letter to Ms. Patricia Miller, U.S. EPA, from Mr. Dennis Moore, Amtrak, re: Request for the March 24, 1994, notification that modified the UAO, 3/28/94. P. 200277-200277.
77. Memorandum to Mr. Peter Kostmayer, U.S. EPA, from Mr. Thomas Voltaggio, U.S. EPA, re: Request for a modification to the UAO to extend the effective date and the compliance date, 5/19/94. P. 200278-200309. Modification No. 5 is attached.
78. Electronic mail memorandum to Ms. Patricia Miller, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Transmittal of a list of respondents who do not intend to comply with the Phase II UAO, 6/27/94. P. 200310-200311.

79. Letter to Douglassville UAO respondents from Ms. Patricia Miller, U.S. EPA, re: Transmittal of a modification to the EPA Administrative Order, Docket No. III-93-43-DC, 2/13/95. P. 200312-200317. Modification No. 6 is attached.
80. Letter to Mr. Eugene Cipriani, SEPTA, from Mr. Daniel Isales, U.S. EPA, re: Request for SEPTA to submit its signature page for the Focused Feasibility Study Administrative Order by Consent, 11/3/97. P. 200318-200318.
81. Administrative Order on Consent for a Focused Feasibility Study (FFS) In The Matter Of: Douglassville Disposal Site. Consolidated Rail Corporation; American Premier Underwriters, Inc.; Lehigh Valley Railroad; CSX Transportation, Inc.; SEPTA; USX Corporation; Cabot Corporation; Kimberly-Clark Corporation, Respondents, Docket No. III- 97-111-DC, 11/7/97. P. 200319-200360. Exhibit 1, Schedule for Completing the Focused Feasibility Study as Described in the Administrative Order on Consent, is attached.
82. Letter to Mr. Ronald Klinikowski, PADEP, from Mr. Victor Janosik, U.S. EPA, re: Transmittal of a copy of the AOC for the Douglassville Disposal Superfund Site, 11/7/97. P. 200361-200361.
83. Letter to Mr. Daniel Isales, U.S. EPA, from Mr. Philip Katauskas, Pepper, Hamilton & Scheetz, re: Notification that the project manager for the FFS will be John Borovsky from Barr Engineering, 11/24/97. P. 200362-200372. An access agreement is attached.
84. Memorandum to Mr. Stanley Laskowski, U.S. EPA, from Mr. Thomas Voltaggio and Ms. Marcia Mulkey, U.S. EPA, re: Request for the Regional Administrator's signature on a UAO for remedial action at the Douglassville Disposal Site, (undated). P. 200373-200373.
85. Mailing list of Douglassville UAO respondents, (undated). P. 200374-200413. Certified mail

receipts from the following parties are attached:

- a) Mr. James Gibbons;
- b) General Electric;
- c) Mr. Lawrence Jensen, Holland & Hart;
- d) G. G. Goddard, Handy & Harmon Tube Co., Inc.;
- e) Mr. Donald Orr, Mayer Pollack Steel Corp.;
- f) W. E. Williamson, Leeds & Northup;
- g) Mr. H. Lester Schurr;
- h) Mr. Steven Clark, Textile Chemical Co.;
- i) Mr. Albert Cimino;
- j) Mr. Kevin Dunningham, Thomas & Betts Corp.;
- k) Mr. Robert Eaton, Chrysler Corp.;
- l) Mr. R.L. Noland, Ametek, Inc.;
- m) Mr. Peter Donis, Caterpillar, Inc.;
- n) Mr. Graham Claytor, AMTRAK;
- o) Mr. Fred Ochroche, Werner's Bus Lines;
- p) Mr. H. Lester Schurr, Berks Associates, Inc.;
- q) Mr. Joseph Mooney, Monsey Products, Inc.;
- r) Mr. John Curcio, Mack Trucks, Inc.;
- s) Mr. Samuel Simon, Simon Resources, Inc.;
- t) Mr. James Hagen, CONRAIL;
- u) Mr. Thomas Lewis, Total Recovery, Inc.;
- v) Mr. Julius Simon, Mid-State Trading Co.;
- w) Mr. Robert Campbell, P P & L;
- x) Mr. Sanford Weill, Primerica Corp.;
- y) Mr. J. Glenwood Baker, JGB Industries, Inc.;
- z) Mr. Samuel Goldstein, A & A Waste Oil Co.;
- aa) Mr. Robert Cizik, Cooper Industries, Inc.;
- bb) Mr. Southwood Morcott, Dana Corp.;
- cc) Mr. Richard Rivers, CRC Chemicals, Inc.;
- dd) Mr. David Gardiner, Cerro Metal Products;
- ee) Mr. James Mellor, General Dynamics Corp.;
- ff) Mr. Kenneth Worton, New Jersey Transit;
- gg) Mr. James Yerger.

III. REMEDIAL RESPONSE PLANNING

1. Letter to Ms. Kathy Hodgkiss, U.S. EPA, from Mr. Michael R. Steiner, PADER, re: PADER's comments on the draft Work Plan, 6/16/83. P. 300001-300001.
2. Report: Remedial Action Master Plan, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 11/83. P. 300002-300097.
3. Letter to Mr. Michael Steiner, PADER, from Mr. William A. Hagel, U.S. EPA, re: The final Remedial Action Master Plan, 2/27/84. P. 300098-300098.
4. Report: Work Plan, Remedial Investigation/Feasibility Study, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 4/84. P. 300099-300187.
5. Letter to Mr. Michael Steiner, PADER, from Mr. William A. Hagel, U.S. EPA, re: The final Remedial Investigation/Feasibility Study (RI/FS) Work Plan, 5/4/84. P. 300188-300188.
6. Letter to Mr. William Hagel, U.S. EPA, from Mr. Michael Steiner, PADER, re: Review and approval of the RI/FS, 5/29/84. P. 300189-300189.
7. Letter to Mr. Lester Schurr, Berks Associates, Incorporated, from Mr. William A. Hagel, U.S. EPA, re: Start date for sampling and drilling at the site, 6/27/84. P. 300190-300190.
8. Report: Site Operations Plan, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 10/84. P. 300191-300275.
9. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Dwight D. Worley, PADER, re: Review of and concurrence with the second draft of the Record of Decision (ROD), 9/24/85. P. 300276-300277.
10. Record of Decision, Remedial Action Alternative

Selection, Douglassville Disposal Site, Berks County Pennsylvania, 9/27/85. P. 300278-300320.

11. Letter to Ms. Judy Dorsey, U.S. EPA, from Mr. Marc E. Gold, Wolf, Block, Schorr and Solis-Cohen, re: Negotiations with Potentially Responsible Parties (PRPs) concerning assistance in performing remedial design activities, 12/12/85. P. 300321-300322.
12. Letter to Ms. Judith Dorsey, U.S. EPA, from Mr. Marc E. Gold, Wolf, Block, Schorr and Solis-Cohen, re: Summary of Total Recovery, Inc.'s proposed alternative clean-up plan, 3/11/86. P. 300323-300362. A report entitled "Corporate Review and Select Test Data" is attached.
13. Report: Remedial Investigation Report/Feasibility Study of Alternatives, Volume I, Berks Associates, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 6/86. P. 300363-300713.
14. Report: Remedial Investigation Report/Feasibility Study of Alternatives, Volume II, Appendices A-D, Berks Associates, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 6/86. P. 300714-300972.
15. Report: Remedial Investigation Report/Feasibility Study of Alternatives, Volume III, Appendices E-F, Berks Associates, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 6/86. P. 300973-301214.

Reports and information regarding the Douglassville Disposal Site, dated post-June 1989 Record of Decision for OU2-Phase II.

16. Report: Barr Engineering Company, Douglassville Treatability Study, Phase I Final Report, prepared by Kiber Environmental Services, Inc., 9/2/92. P. 301215-301339.
17. Report: Bioremediation Treatability Study, Volume II, Appendix E.6, prepared by Kiber Analytical

Services, Inc., 9/29/92. P. 301340-301723.

18. Report: Barr Engineering Company, Douglassville Treatability Study, Phase II Final Report, prepared by Kiber Environmental Services, Inc., 11/19/92. P. 301724-301967.
19. Report: Douglassville Treatability Study, Berks County, PA, Final Report, prepared by Bioremediation Service, Inc., 5/24/93. P. 301968-302415.
20. Report: Barr Engineering Company, Douglassville Treatability Study, Phase III and IV Final Report, prepared by Kiber Environmental Services, Inc., 6/93. P. 302416-302875.
21. Report: Barr Engineering Company, Douglassville Treatability Study, Durability Testing Final Report, prepared by Kiber Environmental Services, Inc., 6/93. P. 302876-303197.
22. Report: Barr Engineering Company, Douglassville Treatability Study, Synopsis Report, prepared by Kiber Environmental Services, Inc., 6/93. P. 303198-303404.
23. Report: Final Report, Determining the Efficacy of the Bioremediation Process for Oily Waste at the Douglassville Site, prepared by Dr. Gary McGinnis, 6/30/93. P. 303405-303458.
24. Letter to Mr. William P. Thornton, Jr., General Electric Company, from Mr. John P. Borovsky, Barr Engineering Company, re: Treatability testing of filter cake material from Source Area 2, 6/30/93. P. 303459-303463.
25. Report: Supplemental Alternative Analysis Report, Operable Unit 2, Phase II, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering Company, 8/93. P. 303464-303961.

26. A handwritten meeting attendance list, 11/19/93.
P. 303962-303970. The following are attached:
- a) an agenda of the meeting with the
Douglassville PRP Group with EPA Region
III;
 - b) information on Fate of Organics and Metals;
 - c) Table 4-10, Summary of Lead and PCB
Emissions in Treated Waste From Source Area
2 - Douglassville Disposal Site;
 - d) a Douglassville Lead Concentration Table;
 - e) Table 4-1, Occurrence and Distribution of
Contaminants in Soil.
27. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from
Mr. Richard A. Marton, Barr Engineering Company, re:
The immobilization treatability study reports and
the comparison of Maximum Contaminant Level drinking
water standards and Toxicity Characteristic Leaching
Procedure (TCLP) extract concentrations, 11/24/93.
P. 303971-303973. A table entitled "TCLP Extract
Concentrations From Untreated Versus Treated Waste
and Comparisons With MCLS" is attached.
28. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from
Mr. Richard A. Marton, Barr Engineering Company, re:
TCLP testing results for samples that were treated
during the immobilization treatability study,
4/5/94. P. 303974-303977. A table
entitled "TCLP Results for Immobilized Waste Mixture
14" is attached.

29. Memorandum to Mr. Peter H. Kostmayer, U.S. EPA, from Mr. Thomas C. Voltaggio, U.S. EPA, re: Summary of the PRPs issues concerning the Phase II On-Site Thermal Treatment and EPA's detailed response, 4/21/94. P. 303978-305494. The following are attachments to EPA's detailed response:
- a) a letter to Mr. Benjamin Stonelake, Blank, Rome, Comisky and McCauley, from Ms. Patricia C. Miller, U.S. EPA, regarding confirmation of the details of the upcoming meeting to discuss treatability studies, dated September 28, 1993;
 - b) a letter to Ms. Patricia C. Miller, U.S. EPA, from Mr. Benjamin G. Stonelake, Blank, Rome, Comisky & McCauley, regarding additional people attending the meeting discussing the Defendant's treatability studies, dated September 29, 1993;
 - c) a letter to Ms. Patricia C. Miller, U.S. EPA, from Mr. Benjamin G. Stonelake, Blank, Rome, Comisky & McCauley, regarding limiting the scope of the meeting to a discussion of the Defendants' treatability studies, dated October 1, 1993;
 - d) a memorandum to file from Mr. Victor Janosik, U.S. EPA, regarding the meeting to discuss the bioremediation and stabilization/ solidification treatability studies that were submitted by the PRPs, dated October 7, 1993;

- e) a U.S. EPA Environmental News bulletin entitled "EPA Administrator Browner Announces New Hazardous Waste Reduction and Combustion Strategy," dated May 18, 1993;
- f) a memorandum to Ms. Joan Mattox, U.S. EPA, from Ms. Patricia M. Erickson, U.S. EPA, regarding the review of solidification/stabilization treatability study, dated November 10, 1993;
- g) a memorandum to Mr. Victor J. Janosik, U.S. EPA, from Mr. Donald A. Oberaker and Ms. Marta K. Richards, U.S. EPA, regarding comments about the application of incineration to the site, Source Area 2, dated October 8, 1993;
- h) a memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Victor J. Janosik, U.S. EPA, regarding Source Area 2 filter cake waste, dated March 9, 1994;
- i) an article entitled "Incineration of Hazardous Waste: A Critical Review Update," from the Journal of the Air & Waste Management Association, dated January 1993;
- j) a memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Patricia Flores, U.S. EPA, regarding the formation of dioxin during incineration processes, dated December 9, 1993;
- k) a memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Nancy Rios, U.S. EPA, regarding the incinerator risk analysis and clarification of lead emissions, dated January 31, 1994;
- l) a memorandum to Mr. Victor Janosik, U.S. EPA, from Mr. John J. Smith, U.S. EPA,

regarding the pending remedial action at the site, dated March 18, 1994;

- m) a report entitled Douglassville Disposal Superfund Site (Phase II) Thermal Treatment, Berks County, PA, Final Design Analysis (100%), dated March 1993;
 - n) a report entitled Douglassville Disposal Superfund Site (Phase II) Thermal Treatment, Berks County, PA, Appendix, dated March 1993;
 - o) a report entitled Remedial Design Specifications Volume I, Douglassville Disposal, Phase II, Berks County, Pennsylvania, dated March 1993;
 - p) a report entitled Remedial Design Specifications Volume 2, Douglassville Disposal, Phase II, Berks County, Pennsylvania, dated March 1993;
 - q) a drawings report entitled Plans for Douglassville Disposal Superfund Site - Phase II, Berks County, Pennsylvania, dated January 1993.
30. Letter to all addressees from Ms. Patricia C. Miller, U.S. EPA, re: Issuance of a Unilateral Administrative Order (UAO) on June 30, 1993 requiring 34 respondents to perform the remedial action at the site, 4/29/94. P. 305495-305495.
31. Information on the preliminary independent assessment of potential risks posed by the use of the proposed incineration remedy, (undated). P. 305496-305508. Attachment 1, Summary of Development of the Engineered Incinerator, is attached.

32. Berks Douglassville Site White Paper, (undated).
P. 305509-305520.
33. Report: Five-Year Review Report, Douglassville Disposal, Superfund Site, prepared by U.S. EPA,
6/6/94. P. 305521-305523.
34. Record of Decision, Douglassville Disposal Site,
6/30/89. P. 305524-305624.
35. Waste Profile, Douglassville Site, prepared by
Chemical Waste Management, Inc., 8/16/91. P.
305625-305631. Two July 18, 1991, SSM Laboratories
Analytical Reports are attached.
36. Report: Project Health and Safety Plan, Douglassville Disposal Site Source Area 2, Union Township, Pennsylvania, prepared by Barr Engineering
Company, 6/92. P. 305632-305793.
37. Report: Field Sampling Plan, Treatability Studies of Filter Cake (sic) Material at Source Area 2, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering Company,
7/92. P. 305794-305831.
38. Report: Plans for Douglassville Disposal Superfund Site - Phase II, Berks County, Pennsylvania,
prepared by U.S. Army Corps of Engineers (USACE) and
TAMS Consultants, Inc., 1/93. P. 305832-305860.
39. Report: Remedial Design Specifications Volume 1, Douglassville Disposal, Phase II, Berks County, Pennsylvania, prepared by USACE, 3/93. P. 305861-
306128.
40. Report: Remedial Design Specifications Volume 2, Douglassville Disposal, Phase II, Berks County, Pennsylvania, prepared by USACE, 3/93. P. 306129-
306415.
41. Report: Final Design Report Appendix, Douglassville Disposal Superfund Site, Phase II, Thermal Treatment, Berks County, Pennsylvania, prepared by
TAMS Consultants, Inc., 3/5/93. P. 306416-306805.

42. Report: Final Design Report, Douglassville Disposal Superfund Site, Phase II - Thermal Treatment, Berks County, Pennsylvania, prepared by TAMS Consultants, Inc., 3/9/93 (sic). P. 306806-307094.
43. Letter to Mr. Ralph Lindeman, U.S. Department of Justice, from Mr. Benjamin Stonelake Jr., Blank, Rome, Comisky & McCauley, re: Transmittal of documents relating to the treatability studies performed for defendants in the United States v. Berks Associates, et al. litigation, 6/30/93. P. 307095-307096.
44. Memorandum to Ms. Joan Colson, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Request for technical assistance to review and provide comments on the treatability studies, 7/14/93. P. 307097-307098.
45. Memorandum to Mr. Victor Janosik, U.S. EPA, from Mr. Donald Oberacker and Ms. Marta Richards, U.S. EPA, re: Summary comments from the "Thermal Group" on the selection of an incineration remedy for Source Area 2 of the site, 10/8/93. P. 307099-307102.
46. Memorandum to Ms. Joan Mattox, U.S. EPA, from Ms. Patricia Erickson, U.S. EPA, re: Review of documents pertaining to the solidification/stabilization treatability study for the Douglassville Superfund Site, 11/10/93. P. 307103-307115. The following are attached:
- a) "Table 1: Phase IV TCLP Results, VOC's, Formulation 14;"
 - b) "Table 2: Phase IV TCLP Results, SVOC's, Formulation 14;"
 - c) an October 21, 1993, letter to Ms. Trish Erickson, U.S. EPA, from Mr. Richard Marton, Barr Engineering Company, transmitting additional analysis for treatability study samples;
 - d) an October 1, 1993, memorandum to Mr. Richard Marton, Barr Engineering Company, from Mr. Stephen Zarlinski, Kiber

Environmental Services, Inc., summarizing additional test results for the immobilization treatability study;

e) the September 22, 1993, analyses results.

47. Memorandum to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Summary of Risk Reduction Engineering Laboratory (RREL) review of bioremediation treatability studies, solidification/stabilization treatability studies, incineration, and risk assessment, 11/18/93. P. 307116-307118.
48. Agenda for "Meeting of Douglassville PRP Group with EPA Region III," prepared by the "'opt in' PRP Group at the Berks Associates, Douglassville Disposal Site," 11/19/93. P. 307119-307122.
49. Summary of information on solidification/stabilization of organics, prepared by Ms. Patricia Erickson, U.S. EPA, 12/21/93. P. 307123-307126. A transmittal memorandum to Mr. Norm Kulujian, U.S. EPA, from Ms. Patricia Erickson, U.S. EPA, is attached.
50. Memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Nancy Rios, U.S. EPA, re: Clarification of the lead emissions issue presented in the November 16, 1993, risk assessment for the Douglassville incinerator, 1/31/94. P. 307127-307235. The "Douglassville Disposal Superfund Site, Direct Exposure Pathway Risk Assessment for the Proposed On-Site Incinerator" and a November 16, 1993, transmittal memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Nancy Rios, U.S. EPA, are attached.
51. Memorandum to Mr. Anthony Dappolone, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Re-evaluation of filter cake waste lead levels discussed in the June 1993, Barr Engineering Company Douglassville Treatability Study Synopsis Report, and the May 24, 1993, Douglassville Treatability Study, Berks County, PA, Final Report; and re-evaluation of the January 1992, EPA Phase II Pre-Design Investigation

Thermal Treatability Testing Report for information regarding individual filter cake samples, 3/9/94. P. 307236-307244. Relevant pages from the referenced reports are attached.

52. Memorandum to Mr. Victor Janosik, U.S. EPA, from Mr. John Smith, U.S. EPA, re: Recommendation that appropriate measures be taken to assess the risks associated with indirect pathways of exposure before the Douglassville incinerator begins full production operation, 3/18/94. P. 307245-307246.
53. Memorandum to Mr. Peter Kostmayer, U.S. EPA, from Mr. Thomas Voltaggio, U.S. EPA, re: Recommendation for concurrence with the conclusion that a change in the on-site incineration remedy selected in the June 30, 1989, ROD is not required, 4/21/94. P. 307247-307269. "U.S. EPA - Region III Response to PRPs' Post-ROD Submittals Concerning Remedial Action at the Douglassville Disposal Superfund Site, Berks County, Pennsylvania" is attached.
54. Letter to "All Addressees" from Ms. Patricia Miller, U.S. EPA, re: Notification that EPA will move forward to implement the original incineration remedy pursuant to the Unilateral Administrative Order, 4/29/94. P. 307270-307270.
55. Agenda for "Meeting of Douglassville PRP Group with EPA Region III," prepared by the "'opt in' PRP Group at the Berks Associates, Douglassville Disposal Site," 5/10/94. P. 307271-307278.
56. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Joseph Fiteni, TAMS, re: Transmittal of analytical test results for Feed Soil Samples from the Douglassville Site, 6/13/94. P. 307279-307288. The results are attached.
57. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. John Borovsky, Barr Engineering Company, re: Comments on EPA's response to PRPs' post ROD submittals, 6/22/94. P. 307289-307443. Several documents supporting the PRP's comments are

attached.

58. Letter to Mr. Ronald Klinikowski, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Notification that the majority of respondents named in the UAO intend not to comply with the Order and that it is likely that EPA will proceed with the remedial action using Superfund monies, 6/29/94. P. 307444-307444.
59. Memorandum to Mr. Abraham Ferdas, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Recommendation for concurrence to pursue remedial action at the site as a Fund-Lead project using Fiscal Year 1995 monies, 7/12/94. P. 307445-307446.
60. Report: Project Health and Safety Plan, Appendices, prepared by Barr Engineering, 6/96. P. 307447-307748.
61. Letter to Mr. Benjamin Stonelake, Blank, Rome, Comisky & McCauley, from Mr. Albert Perini, Perini Environmental Services, Inc., re: Transmittal of a remedial alternative for Areas 2, 2N, and 9 of OU2 for the Douglassville Disposal Site, 6/1/95. P. 307749-307882. A table entitled "Percent TPH, Sand Springs Superfund Site" and the proposal for the remedial alternative are attached.
62. Letter to Ms. Patricia Miller, U.S. EPA, from Mr. Frank Thomas, Morgan, Lewis & Bockius, re: Request for a meeting to discuss Source Area 2 remediation issues, 6/19/96. P. 307883-307892.
- **** 63. Report: Dispersion By Chemical Reaction (DCR) Stabilization Of Acid Tar From The Douglassville Pennsylvania Superfund Site, prepared by SOUND/epic, 11/2/95. P. 307893-307907.
64. Letter to Mr. Thomas Voltaggio, U.S. EPA, from Mr. John Borovsky, Barr Engineering, re: Transmittal of additional information concerning the proposed remediation for Source Areas 2 and 9, 9/17/96. P.

**** This document has been intentionally left out of chronological order.

307908-307988. The following are attached:

- a) "Table 1, TCLP Lead Data;"
- b) "Table 2, Modified ANSI 16.1 Leachability Testing, Summary of Results;"
- c) "Table 3, Potential Pennsylvania Location-Specific ARARs for the Stabilization and On-site Landfill Remedy, Douglassville Disposal Site;"
- d) "Table 4, Summary of Estimated Costs for Stabilization and On-Site Landfill Disposal Alternative, Douglassville Disposal Site, Berks County, Pennsylvania;"
- e) "Table 5, Specific Items Included in the Summary of Estimated Costs for Stabilization and On-Site Landfill Disposal, Douglassville Disposal Site, Berks County, Pennsylvania;"
- f) "Figure 1, Theoretical Solubilities of Selected Amphoteric Metal Hydroxides;"
- g) "Figure 2, Existing Site Conditions;"
- h) "Figure 3, Proposed Residual Waste Landfill Location if Waivers are not Obtained from the Two Residences Southwest of the Pond;"
- i) "Figure 4, Proposed Residual Waste Landfill Location if Waivers are Obtained from the Two Residences Southwest of the Pond;"
- j) a journal article entitled "Disposal of Oily Sludges and Oil Spill Debris by Using the Patented DCR-Process," from LEO Consult Gmbh, Bremen Germany;
- k) a journal article entitled "Aral Dollbergen Site Groundwater Monitoring Data," (source not cited);
- l) a journal article entitled "The Treatment

of Special Wastes and Their Reuse as Road Construction Material," presented at The 4th International Recycling conference, Berlin, October 30 to November 1, 1984;

- m) a journal article entitled "Neue Entwicklungen bei der Verfestigung von Sonderabfällen," from Verfestigung von Sonderabfällen;
 - n) "Proceedings of R&D92, National Research & Development Conference on the Control of Hazardous Materials;"
 - o) a journal article entitled "Refinery Site at Dollbergen (ARAL), Evaluation of DCR Treated Oil Waste Materials," (source not cited);
 - p) a journal article entitled "The Remediation of an Oil Lagoon in Dollbergen," (source not cited);
65. Letter to Mr. Victor Janosik, U.S. EPA, from Ms. Joan Mattox, U.S. EPA, re: Transmittal of review comments on the proposed stabilization treatment, 10/18/96. P. 307989-307994. Comments on and suggestions for evaluation tests of the DCR process are attached.
66. Letter to Ms. Patricia Erickson, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Request for additional comments on the viability of the DCR proposal as a remedial alternative, 10/21/96. P. 307995-307995.
67. Letter to Mr. Victor Janosik, U.S. EPA, from Ms. Joan Mattox, U.S. EPA, re: Transmittal of comments on the DCR proposal for the Douglassville Disposal Site, 10/29/96. P. 307996-307997. The comments are attached.
68. Facsimile cover sheet to Mr. Victor Janosik, U.S. EPA, from Ms. Tricia Erickson, U.S. EPA, re: Transmittal of a memorandum regarding the necessity of treatability tests to demonstrate the viability of the DCR proposal, 10/29/96. P. 307998-307999.

The memorandum is attached.

69. Report: Specification (Final Design for Review),
Douglassville Disposal Superfund Site, Phase II,
Berks County, PA, prepared by USACE, 11/96. P.
308000-308386. A November 1996, Supplement to the
Design Analysis is attached.
70. Letter to Mr. Ron Klinkowski, PADEP, from Mr. Victor
Janosik, U.S. EPA, re: Transmittal of information
regarding DCR technology and its potential
applicability to the Douglassville Site, 11/15/96.
P. 308387-308387.
71. Letter to Mr. Kirk Englebart, USACE, from Mr. Victor
Janosik, U.S. EPA, re: Request for USACE to
discontinue remedial design activities relating to
the offsite incineration of wastes, 11/4/96. P.
308388-308388.
72. Electronic mail memorandum to Mr. Victor Janosik,
U.S. EPA, from Ms. Patricia Erickson, U.S. EPA, re:
Information on contaminants of concern and their
potential for aqueous transport at the Douglassville
Site, 1/2/97. P. 308389-308389.
73. Letter to Mr. Victor Janosik, U.S. EPA, from Mr.
John Borovsky, Barr Engineering, re: Summary of a
meeting with U.S. EPA regarding the development of a
treatability study protocol, 1/9/97. P. 308390-
308395.
74. Letter to Mr. Rick Marton, Barr Engineering, from
Mr. Victor Janosik, U.S. EPA, re: Transmittal of
information related to EPA's Contract Laboratory
Program (CLP), 1/10/97. P. 308396-308532. The
information is attached.
75. Letter to Mr. Victor Janosik, U.S. EPA, from Mr.
Ronald Klinkowski, PADEP, re: Comments on the
Proposed Plan to use DCR as a stabilization
technology for oily filter cake waste at Areas 2 and
9, 1/23/97. P. 308533-308534.
76. Letter to Mr. Rick Marton, Barr Engineering, from
Mr. Victor Janosik, U.S. EPA, re: Transmittal of a

January 23, 1997, letter from PADEP delineating state requirements for the disposal of residual wastes at the site, 1/29/97. P. 308535-308537. The letter is attached.

77. Report: Quality Assurance Project Plan for the Stabilization Treatability Study, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering, 3/97. P. 308538-309163.
78. Report: Stabilization Treatability Study Work Plan for Material from Source Area 2, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering, 3/97. P. 309164-309223.
79. Report: Project Health and Safety Plan, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering, 3/97. P. 309224-309276.
80. Report: Field Sampling Plan for the Stabilization Treatability Study, prepared by Barr Engineering, 3/97. P. 309277-309327. A March 5, 1997, transmittal letter to Mr. Victor Janosik and Ms. Patricia Erickson, U.S. EPA, from Mr. Richard Marton, Barr Engineering, is attached.
81. Facsimile cover sheet to Mr. Victor Janosik, U.S. EPA, from Ms. Tricia Erickson, U.S. EPA, re: Transmittal of comments on the March 1997, Douglassville Disposal Site Stabilization Treatability Study Work Plan for Material from Source Area 2, 3/12/97. P. 309328-309334. The comments and a March 13, 1997, facsimile cover sheet to Mr. Rick Marton, Barr Engineering, from Mr. Victor Janosik, U.S. EPA, is attached.
82. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Response to EPA comments on the March 1997, Stabilization Treatability Study Work Plan for Material from Source Area 2, 3/27/97. P. 309335-309346. The response to comments is attached.

83. Electronic mail memorandum to Mr. Ed Barth, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, re: Response to a question concerning the detection of an oily phase during the treatability study, 4/4/97. P. 309347-309347.
84. Letter to Mr. Benjamin Stonelake, Blank, Rome Comisky & McCauley, and Mr. Philip Katauskas, Pepper, Hamilton, & Scheetz, from Mr. James Langseth, Barr Engineering, re: Transmittal of a cost estimate for the remediation of Areas 2 and 9 using the DCR-stabilization remedy, 4/9/97. P. 309348-309356. The cost estimate is attached.
85. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Transmittal of a progress report for the period ending April 18, 1997, and a field audit report for the March 17-19, 1997, field sampling event, 4/23/97. P. 309357-309366. The progress report, field audit report, and a facsimile cover sheet to Ms. Tricia Erickson and Mr. Ed Barth, U.S. EPA, from Mr. Victor Janosik, U.S. EPA, are attached.
86. Report: Summary Report of Laboratory Quality Assurance Audit, prepared by Barr Engineering, 5/19/97. P. 309367-309589. The report and a May 19, 1997, transmittal letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, is attached.
87. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Transmittal of the progress report for the period from April 19, 1997, through May 18, 1997, 5/30/97. P. 309590-309601. The progress report is attached.
88. Letter to Mr. Richard Marton, Barr Engineering, from Mr. Victor Janosik, U.S. EPA, re: Approval of a request to extend the deadline for the submittal of the Treatability Study Evaluation Report, 6/3/97. P. 309602-309602.
89. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Transmittal

of a progress report for the period of May 19, 1997, through June 30, 1997, and tables summarizing data collected through June 30, 1997, 7/15/97. P. 309603-309645.

90. Letter to Mr. Richard Marton, Barr Engineering, from Mr. Victor Janosik, U.S. EPA, re: Approval of a request to extend the deadline for the submittal of the Treatability Study Evaluation Report, 7/22/97. P. 309646-309646.
91. Electronic mail memorandum to Mr. Victor Janosik, U.S. EPA, from Mr. Ed Barth, U.S. EPA, re: Comments on the DCR progress report, 7/31/97. P. 309647-309647.
92. Report: Draft Treatability Study Evaluation Report for the DCR Stabilization Treatability Study, Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering Company, 8/97. P. 309648-310274.
93. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Transmittal of the August 1997, Draft Treatability Study Evaluation Report for DCR Stabilization of Material from Source Area 2, Douglassville Disposal Site, Berks County, Pennsylvania, 8/14/97. P. 310275-310275.
94. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Transmittal of a progress report for the month ending July 31, 1997, 8/14/97. P. 310276-310278. The progress report is attached.
95. Facsimile cover sheet to Mr. Daniel Isales, U.S. EPA, Mr. Victor Janosik, U.S. EPA, Mr. Benjamin Stonelake, and Mr. Phillip Katauskas, from Mr. Rick Marton, Barr Engineering, re: Transmittal of a schedule for completing the FFS, 8/27/97. P. 310279-310280. The schedule is attached.
96. Electronic mail memorandum to Mr. Victor Janosik, U.S. EPA, from Mr. Ed Barth, U.S. EPA, re: Comments on the August 1997 treatability study, 9/12/97. P.

310281-310281.

97. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Ronald Klinikowski, PADEP, re: Notification that PADEP reviewed the August 15, 1997, Draft Treatability Study Evaluation Report and has no comments, 9/30/97. P. 310282-310282.
98. Letter to Mr. Richard Marton, Barr Engineering, from Mr. Victor Janosik, U.S. EPA, re: Approval of the Draft Treatability Study Evaluation Report and request for submittal of a Draft Focused Feasibility Report, 11/7/97. P. 310283-310283.
99. Facsimile memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Tricia Erickson, U.S. EPA, re: Notification that either Mr. Ed Barth or Ms. Erickson will review a "technical definition," examples of processes that would be acceptable for Douglassville, and the revised FFS, 7/13/98. P. 310284-310284.
100. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering, re: Request that other lime-based stabilization processes be approved for remediation of Source Areas 2 and 9, 7/24/98. P. 310285-310294. "Table 1, Lime-Based Stabilization of Oily Wastes, Project Examples Using the DCR Process" and "Table 2, Lime-Based Stabilization of Oily Wastes, Project Examples Using Lime-Based Stabilization Other Than the DCR Process" are attached.
101. Report: Focused Feasibility Study for the Douglassville Disposal Site, Berks County, Pennsylvania, prepared by Barr Engineering Company, 11/98. P. 310295-310654. A November 4, 1998, letter to Mr. Victor Janosik, U.S. EPA, from Mr. Richard Marton, Barr Engineering Company, transmitting the revised FFS and comments on the draft FFS; "Barr Engineering Company and Douglassville Disposal Site PRP Group Responses to Additional EPA, Region 3, and PADEP Comments, Dated October 1, 1998, on the

Draft Focused Feasibility Study;" and a November 16, 1998, letter to Mr. Richard Marton, Barr Engineering Company, from Mr. Victor Janosik, U.S. EPA, accepting the revised FFS as "final," are attached.

- 102. Letter to Mr. Vic Janosik, U.S. EPA, from Mr. Richard Morgan, PADEP, re: Comments regarding the Draft Five Year Review Report, 3/30/99. P. 310655-310656.
- 103. Five-Year Review Report, Douglassville Disposal Superfund Site, Berks County, Pennsylvania, prepared by U.S. EPA, 4/27/99. P. 310657-310660.
- 104. Proposed Plan, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, 5/99. P. 310661-310698.
- 105. Letter to Mr. Ronald Klinikowski, PADEP, from Mr. Victor Janosik, U.S. EPA, re: Request for comments on the Proposed Remedial Action Plan (PRAP) for Source Areas 2 and 9 at the Douglassville Disposal Site and notification of a public comment period and a public meeting regarding the PRAP, 5/12/99. P. 310699-310699.
- 106. Letter to Ms. Leslie Rebman, Union Township Supervisors, from Mr. Victor Janosik, U.S. EPA, re: Request for comments on the PRAP for Source Areas 2 and 9 at the Douglassville Disposal Site and notification of a public comment period and a public meeting regarding the PRAP, 5/12/99. P. 310700-310700.
- 107. Letter to Ms Lorah Hopkins, Schuylkill River Greenways Association, from Mr. Victor Janosik, U.S. EPA, re: Request for comments on the PRAP for Source Areas 2 and 9 at the Douglassville Disposal Site and notification of a public comment period and a public meeting regarding the PRAP, 5/12/99. P. 310701-310701.

108. Letter to Mr. Richard Marton, Barr Engineering Co., from Mr. Victor Janosik, U.S. EPA, re: Request for comments on the PRAP for Source Areas 2 and 9 at the Douglassville Disposal Site and notification of a public comment period and a public meeting regarding the PRAP, 5/12/99. P. 310702-310702.
109. Letter to Mr. Peter Knight, National Oceanic and Atmospheric Administration, from Mr. Victor Janosik, U.S. EPA, re: Transmittal of the Proposed Remedial Action Plan pertaining to a ROD Amendment for the Douglassville Disposal Site, 5/13/99. P. 310703-310703.
110. Letter to Mr. Arthur Dalla Piazza, PADEP, from Mr. Peter Schaul, U.S. EPA, re: Notification of EPA's position regarding the use of a lime-based stabilization alternative for Source Area 2 wastes at the Douglassville Disposal Site, 5/13/99. P. 310704-310705.
111. Letter to Mr. Michael Chezik, U.S. Department of the Interior, from Mr. Victor Janosik, U.S. EPA, re: Transmittal of the PRAP pertaining to a ROD Amendment for the Douglassville Disposal Site, 5/13/99. P. 310706-310706.
112. Letter to Mr. Victor Janosik, U.S. EPA, from Mr. Arthur Dalla Piazza, PADEP, re: Comments on the PRAP, 6/4/99. P. 310707-310708.
113. Letter to Mr. Ronald Klinikowski, PADEP, from Mr. Victor Janosik, U.S. EPA, re: Request for comments on the Draft ROD Amendment for the Douglassville Disposal Site, 7/22/99. P. 310709-310709.
114. Letter to Mr. Abraham Ferdas, U.S. EPA, from Mr. Michael Steiner, PADEP, re: PADEP's comments on the ROD Amendment for the Douglassville Disposal Site, 8/5/99. P. 310710-310711.
115. Letter to Mr. Abraham Ferdas, U.S. EPA, from Mr.

Michael Steiner, PADEP, re: Request for EPA to recognize PADEP's Applicable or Relevant and Appropriate Requirements regarding the Douglassville Disposal ROD Amendment, 8/31/99. P. 310712-310713.

116. Letter to Mr. Craig Olewiler, PADEP, from Mr. Peter Schaul, U.S. EPA, re: Comments regarding both EPA and PADEP's concerns with the ROD Amendment for Source Areas 2 and 9 for the Douglassville Disposal Site, 9/24/99. P. 310714-310715.
117. Record of Decision Amendment, Douglassville Disposal Site, Operable Unit 2, Source Areas 2 and 9, 9/29/99. P. 310716-310741

IV. REMOVAL RESPONSE PROJECTS

1. Memorandum to Mr. Elliott Laws, U.S. EPA, from Mr. Thomas Voltaggio, U.S. EPA, re: Approval of a funding request for a removal action, 3/11/96. P. 400001-400007. A March 11, 1996, memorandum to Mr. Thomas Voltaggio, U.S. EPA, from Mr. Jack Owens, U.S. EPA, requesting funds for a removal action is attached.

V. COMMUNITY INVOLVEMENT/CONGRESSIONAL
CORRESPONDENCE/IMAGERY

1. Letter to Mr. Donald Gutekunst, Union Township Supervisors, from Mr. William A. Hagel, U.S. EPA, re: Request for the draft RI/FS Work Plan to be made available for public review, 3/19/84. P. 500001-500001.
2. Memorandum to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. William Hagel, U.S. EPA, re: Summary of a March 28, 1984 public meeting, 4/1/84. P. 500002-500002.
3. Memorandum to Mr. D.R. Brenneman from Mr. R.E. Stecik, re: Summary of a March 28, 1984 public meeting, 4/4/84. P. 500003-500004.
4. Letter to Mr. William A. Hagel, U.S. EPA, from Mr. Davis L. Allebach, Jr., Reynier, Crocker, Allebach & Reber, re: Status and well water testing requested by residents, 6/22/84. P. 500005-500005.
5. Letter to Mr. David L. Allebach, Jr., Reynier, Crocker, Allebach & Reber, from Mr. William A. Hagel, U.S. EPA, re: EPA sampling of residential wells, 7/2/84. P. 500006-500006.
6. Letter to Mr. Donnell Marshall, Laurel Locks Farms, from Mr. Richard L. Zambito, U.S. EPA, re: Confirmation of permission granted by Mr. Marshall allowing EPA's contractor to install a monitoring well on his property, 8/22/84. P. 500007-500007.
7. Report: Community Relations Plan, Douglassville Disposal Site, Union Township, Berks County, Pennsylvania, prepared by NUS Corporation, 12/84. P. 500008-500030.
8. Press Release from U.S. EPA Environmental News entitled "EPA Schedules Public Meeting for Douglassville Superfund Site," 6/21/85. P. 500031-500031.
9. Public meeting agenda, Douglassville Superfund Site, 7/10/85. P. 500032-500032.

10. Handwritten letter to Ms. Nanci Sinclair, U.S. EPA, from Mr. Donald Weber, re: Comments about the public meeting on well contamination and a request for EPA to test residential wells, 7/16/85. P. 500033-500033.
11. Press Release from U.S. EPA Environmental News entitled "EPA Approves Clean-Up Alternative for Douglassville Disposal Superfund Site," 10/11/85. P. 500034-500035.
12. Letter to Mrs. Pat Hobbs from Mr. Bruce P. Smith, U.S. EPA, re: Response to a request made by Ms. Hobbs concerning contamination, proposed activities, and future operations of the site owners, 3/12/86. P. 500036-500037.
13. U.S. EPA and PADER Fact Sheet entitled "Preferred Remedial Alternative for the Berks Associates, Douglassville Disposal Superfund Site," (undated). P. 500038-500039.
14. Site summary package, Douglassville Disposal Site, re: Site background, remedial activities, and activities to date, (undated). P. 500040-500042.
15. U.S. EPA Public Notice, Douglassville Disposal Site, re: Invitation for public comment on the proposed remedial action plan, 5/10/99. P. 500043-500043.
16. Transcript of public meeting, Douglassville Disposal Site, 5/19/99. P. 500044-500099.
17. Letter to Mr. Victor Janosik, U.S. EPA, from Beryl Glassmoyer, re: Request for the EPA to consider Alternative 3 - off site incineration to clean up the Douglassville Disposal Site, 5/24/99. P. 500100-500101. An EPA public notice announcing the public comment period for the proposed remedial action plan is attached.

BIBLIOGRAPHY OF SITE SPECIFIC GUIDANCE DOCUMENTS

1. Superfund Public Health Evaluation Manual, prepared by U.S. EPA, 10/86.
EPA 540/1-86/060
OSWER 9285.4-1
2. Technology Screening Guide for Treatment of CERCLA Soils and Sludges, prepared by U.S. EPA, 9/88.
EPA/540/2-88/004
3. U.S. EPA Fact Sheet entitled "Superfund at Work, Hazardous Waste Cleanup Efforts Nationwide," Fall 1993. EPA 520-F-94-003.
4. Dempsey, C. R., and E. T. Oppelt, U.S. EPA.
"Incineration of Hazardous Waste: A Critical Review Update." Air & Waste, Journal of the Air & Waste Management Association. January 1993.
5. Memorandum to Mr. Victor Janosik, U.S. EPA, from Ms. Patricia Flores, U.S. EPA, re: Guidance on the formation of dioxin during incineration processes, 12/9/93. P. A September 24, 1993, "Draft EPA Guidance on Implementation of Guidance on Conducting Indirect Exposure Assessments for RCRA Hazardous Waste Combusters," is attached.
6. McManus, R. W., P. Grajczak, J. C. Wilcoxson, and S. D. Webster. "Implementation of an Ex Situ Stabilization Technique at the Sand Springs Superfund Site to Solidfy and Stabilize Acid Tar Sludges Involving a Quick-Lime Based Stabilization Process and Innovative Equipment Design." (Source not cited.) (undated.)
7. Information on DCR technology: "Method of Immobilizing Contaminants in the Soil or in Materials Similar to the Soil," excerpt from Patent No. 5,413,616, issued 5/9/95; and "Method of Immobilizing Contaminants in the Soil or in Materials Similar to the Soil (Reacting with sulfide, hydroxide, carbonate or phosphate to form water insoluble product; calcium and aluminum hydroxide with hydrophobizing agent such as talc, fatty acid)," excerpt from Patent No. 5,234,485,

issued 8/10/93.